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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 SHIU LUNG LEUNG, aka CHAO-LUNG  
15 LIANG and STEVEN LEUNG ,  
16 Defendant.

Case No. 09-CR-0110 SI

**DEFENDANT SHIU LUNG LEUNG'S  
UNOPPOSED APPLICATION AND  
(PROPOSED) ORDER FOR TEMPORARY  
INTERNATIONAL TRAVEL OUTSIDE  
THE NORTHERN DISTRICT OF  
CALIFORNIA**

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18 Defendant Shiu Lung Leung hereby requests that this Court permit him to travel outside the  
19 Northern District of California, to Taoyuan County, Taiwan, to attend mother-in-law's funeral. This  
20 request is based on the following:

- 21 1. On April 16<sup>th</sup>, 2014, this court permitted Mr. Leung to travel to Taiwan to bid farewell to his  
22 mother-in-law, who had fallen into a coma and was on life support system. She was not  
23 expected to live beyond a few days after the order was signed.
- 24 2. Mr. Leung did travel to Taiwan, and was able to bid farewell to his mother-in-law, Mrs. Ho  
25 Tao-Mei Hsu, while she was in the hospital. While Mrs. Hsu was not expected to live  
26 beyond a couple of days after being taken off life support, she did not actually pass on until  
27 May 5th, 2014, (Taiwan time).

- 1       3. Mr. Leung's original travel order allowed him to stay in Taiwan until May 14<sup>th</sup>. However,
- 2           due to work requirements, and school obligations for his son Jordan, Mr. Leung was forced
- 3           to return to the United States on April 30<sup>th</sup>, before his mother-in-law passed on.
- 4       4. As instructed by the original travel order, Mr. Leung promptly returned his passport to
- 5           Pretrial Services upon his return to the United States.
- 6       5. Now that Mrs. Hsu has expired, Mr. Leung would like to once again return to Taiwan with
- 7           his son Jordan, this time to attend the funeral for his mother in law, which is scheduled for
- 8           May 15th. He would return to the United States on May 18<sup>th</sup>. (which is only four days
- 9           beyond the date of return set out in his original travel order, and which allows for the time
- 10          difference between California and Taiwan).
- 11      6. Mr. Leung will stay at his home address, #22, Lane 3, Bai-Nian 2 Street, Longtan Township,
- 12           Taoyuan County, 325 Taiwan.
- 13      7. Mr. Leung will continue to observe all other terms of his release while in Taiwan. Through
- 14           counsel, he will provide the government and his Pretrial Services Officer with his detailed
- 15           itinerary.
- 16      8. In order to facilitate his travel by air consistent with TSA regulations, Mr. Leung requests
- 17           this Court direct Pretrial Services to temporarily return his passport to him. He will use the
- 18           passport to travel to Taiwan and return to the Northern District of California only. Mr.
- 19           Leung will return his passport to the custody of Pretrial Services immediately upon his
- 20           return, no later than May 18<sup>th</sup> 2014, (subject only to Pretrial Services business hours).
- 21      9. Counsel has communicated with government attorney Mr. Peter Huston, and Pretrial
- 22           Services Officer Alan Lew. Neither party has any objection to this travel.

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2 Accordingly, Mr. Leung respectfully requests that the terms of his release be temporarily  
3 modified to permit the requested travel.  
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5 Dated: May 5<sup>th</sup>, 2014  
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8 s/ Dennis Cashman  
9 Attorney for Shiu Lung Leung  
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2                   **ORDER**  
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4         Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that Defendant  
5         Shiu Lung Leung's conditions of release are hereby modified temporarily to permit him to travel outside  
6         of the Northern District of California consistent with the terms and conditions set forth above. Pretrial  
7         Services is directed to return Mr. Leung's passport to him or his counsel to permit Mr. Leung to travel as  
8         set forth above. Mr. Leung shall immediately return his passport to Pretrial Services when the above-  
9         described travel is complete (subject only to Pretrial Services' business hours).  
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11                   IT IS SO ORDERED.  
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13         Dated: May 6, 2014



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14                   The Honorable Susan Illston  
15                   United States District Judge  
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